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Attorneys for Defendants JPMORGAN CHASE BANK, N.A.; CALIFORNIA

RECONVEYANCE CO.; and MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

EMIL P. MILYAKOV;
MAGDALENA A. APOSTOLOVA

Plaintiffs,

v.

JP MORGAN CHASE, N.A.; HSBC BANK
USA, NA; CALIFORNIA
RECONVEYANCE CO.; PAUL
FINANCIAL, LLC; MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS,
INC (MERS); FOUNDATION
CONVEYANCING, LLC; AND DOES 1
THROUGH 100,

Defendants.

Case No. 11-cv-2066-EDL

**STIPULATION REGARDING
DEADLINE TO FILE RESPONSIVE
PLEADING; [PROPOSED] ORDER**

[CIVIL L.R. 6-2]

Judge: Honorable Elizabeth D. Laporte

Bryan Cave LLP
Two Embarcadero Center, Suite 1410
San Francisco, CA 94111-3907

STIPULATION

Plaintiffs Emil P. Milyakov and Magdalena A. Apostolova and Defendants JPMorgan Chase Bank, N.A., California Reconveyance Co., and Mortgage Electronic Registration Systems, Inc. (collectively "the parties"), by and through their counsel of record, hereby stipulate and agree as follows:

WHEREAS,

1. Defendants' responsive pleading is due July 19, 2011. (*See* Dkt. 7).
2. The parties are engaged in discussions to resolve this matter amicably.
3. The parties have requested one previous extension of time and the extension requested herein is not requested for the purposes of delay and will not result in prejudice to the parties or the Court.
4. A trustee's sale of the property located at 106 Madrid Street, San Francisco, California, which is the subject of this action, is currently scheduled for August 10, 2011.

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NOW, THEREFORE

1. Defendants shall file a responsive pleading on or before August 2, 2011.

IT IS SO STIPULATED.

The content of this document is acceptable to all persons who have signed below.

Dated: July 11, 2011

NEWTON LAW GROUP

By: V. D. Nguyen
Vince D. Nguyen
Attorney for Plaintiffs
EMIL P. MILYAKOV AND MAGDALENA A.
APOSTOLOVA

Dated: July 11, 2011

BRYAN CAVE LLP

By: /s/ Robert J. Esposito
Robert J. Esposito
Deborah Goldfarb
Stuart W. Price
Attorneys for Defendants
JPMORGAN CHASE BANK, N.A.;
CALIFORNIA RECONVEYANCE CO.; and
MORTGAGE ELECTRONIC REGISTRATION
SYSTEMS, INC.

~~PROPOSED~~ ORDER

Pursuant to the foregoing Stipulation, and good cause appearing, **IT IS SO ORDERED.**

7/12/2011
Date

